

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

KEILEE FANT, et al.	)	
	)	
Plaintiffs,	)	Case No. 4:15-CV-00253-AGF
	)	
v.	)	
	)	
THE CITY OF FERGUSON,	)	
	)	
Defendant.	)	

**PLAINTIFFS' MOTION TO COMPEL COMPLIANCE WITH SUBPOENAS ISSUED TO  
MARK BYRNE AND MICHAEL SALANT**

Plaintiffs Keilee Fant, *et al.*, pursuant to Rules 34 and 45 of the Federal Rules of Civil Procedure and Local Rule 3.04, move for an order compelling non-parties Mark Byrne and Michael Salant to comply with the subpoenas issued to them in this action by producing all documents and communications as requested in Plaintiffs' subpoenas. Messrs. Byrne and Salant have failed to produce the documents and information requested.

Subpoenas for documents from Mark Byrne and Michael Salant were issued on January 9, 2020. Mark Byrne was properly served on January 10, 2020. Michael Salant was properly served on January 13, 2020. The subpoenas commanded the production of certain relevant documents by January 21, 2020. Both Mark Byrne and Michael Salant failed to respond to the subpoenas.

WHEREFORE, for the reasons set forth in the accompanying Memorandum in Support of this Motion and upon the declaration of Vivake Prasad, Plaintiffs move this Court to enter an Order compelling

Mark Byrne and Michael Salant to produce all documents and communications responsive to Plaintiffs' subpoenas on or before March 1, 2020 or within 7 days of an order from this Court.

**CERTIFICATION**

Pursuant to Local Rule 3.04, counsel for Plaintiffs have made reasonable efforts to meet and confer with counsel for Defendant, who also represent Mr. Byrne and Mr. Salant in connection with these subpoenas, in a good-faith effort to resolve the discovery matters that are the subject of this Motion. Plaintiffs requested a meet and confer for February 10, 2020, which was declined.

Dated: February 13, 2020

Respectfully submitted,

By: Vivake Prasad

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed with the Court's electronic filing system, with notice of case activity to be generated and sent electronically by the Clerk of said Court on February 13, 2020, to all counsel of record.

/s/ Vivake Prasad

